

EG&G ROCKY FLATS

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94-RF-07718- - -

Mark N Silverman
Manager
DOE, RFEQ

Attn J Roberson, S Olinger

POND WATER MANAGEMENT INTERIM MEASURES/INTERIM REMEDIAL ACTION
(IM/IRA) DECISION DOCUMENT - TGH-318-94

Ref M N Silverman ltr (4763) to H P Mann, Authorization for Work Involving
the Pond Water Management Interim Measure/Interim Remedial Action
May 10, 1994

In the referenced letter, the Department of Energy, Rocky Flats Field Office (DOE, RFFO) proposed the completion of the Pond Water Management Interim Measures/Interim Remedial Action Draft Decision Document by September 2, 1994. The September 2, 1994, date was based on DOE RFFO resolving all administrative issues by mid-June 1994. The referenced letter also stated that a final schedule would be developed after all administrative issues were resolved. By this letter, EG&G is providing written notification and clarification of issues requiring resolution before EG&G can proceed, and requesting DOE RFFO's position in writing on these issues.

Since receipt of the May letter, EG&G personnel have participated in several meetings and presentations, both at the working group and management levels, and with both DOE, RFFO and agency personnel, attempting to resolve the scope of the document to be produced. However, despite all efforts and with only six weeks remaining on the proposed schedule to finalize the IM/IRA document, there still remain many unresolved issues that require immediate clarification from DOE, RFFO for EG&G to complete the document. The unresolved issues are listed on the attachment to this letter.


EG&G Surface Water, the organization responsible for completing the document does not consider the September 2, 1994 delivery date achievable even with a highly expedited and expensive effort. EG&G requests written guidance on all issues listed in the attachment to avoid confusion on DOE RFFO's requirements. After receipt of written guidance, EG&G can incorporate all requirements and produce the draft document within 10 weeks. If DOE, RFFO can resolve these issues by July 29, 1994 and perform a concurrent review while the document is being developed, the October 14, 1994, delivery date to the agencies can still be achieved. If, however, either of these two actions cannot be achieved, then EG&G recommends that DOE, RFFO negotiate a revised delivery date with the agencies.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

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EG&G understands the issues at stake in this situation, and desires to do the best job possible in the preparation of this important IM/IRA document, however, we find ourselves with very little time remaining on the proposed schedule to finish a document with so many unresolved issues. We need your assistance to ensure that the proper scope is defined for this effort so we can provide DOE, RFFO with a document that meets DOE, RFFO requirements.

Thank you for your assistance. My contact for this effort is Georgene Porter from Surface Water. She can be reached on extension 5661 or D1862.


T. G. Hedahl, Director
Waste Management
EG&G Rocky Flats, Inc.

SAM meh

Orig and 1 cc - M. N. Silverman

Attachment
As Stated

Pond Water Management IM/IRA Unresolved Issues
(EG&G Recommendations Included Where Appropriate)
July 1994

- 1 What is the purpose of the IM/IRA? Will the IM/IRA serve as a bridge to provide administrative controls between current operations and final operable unit (OU) remedial actions or will it propose the administrative long term strategy for pond water management that OUs and other future activities on plantsite must conform to in order to guarantee discharges of acceptable water quality?
- 2 The regulatory agencies have requested an administrative flow chart designating who is responsible within DOE RFFO for various operations at Rocky Flats, yet previous guidance from DOE, RFFO (5-26-93) requested EG&G to remove the organizational charts and related text. How should EG&G proceed? EG&G will provide space within the document for the inclusion of a current DOE RFFO organization chart, to be supplied by DOE, RFFO if they so desire.
- 3 EG&G will continue to use the term "Benchmarks" in lieu of ARARs at the direction of DOE, RFFO. The agencies have expressed a preference for the use of the term ARARs.
- 4 Should this document include the risk assessment previously conducted, since the agencies have clearly stated that risk assessment is inappropriate? EG&G recommends that we continue to develop the Contaminants of Concern (COC) list for this document based on the appropriate statistical methodology, and utilize this risk assessment to identify the real and appropriate COCs.
- 5 EG&G will use the Department of Energy Derived Concentration Guides to establish levels of control for radionuclides, rather than the site specific stream standards. However, if DOE, RFFO acknowledges Colorado Department of Public Health and Environment (CDPHE) concerns, EG&G suggests, for planning purposes, that DOE RFFO consider setting Segment 4 stream standards as the goal for development of radionuclide control processes.
- 6 Should EG&G proceed with our previous proposal regarding the application of and compliance with, the Segment 4 and 5 Stream Standards? CDPHE has indicated numerous times that a single pre-operational sampling event should be used to indicate compliance with standards, however, EG&G has proposed using 90-day average values for Segment 4 compliance evaluation and three-year rolling average values for Segment 5 compliance evaluation. The method of determining compliance will have significant impacts on the sampling requirements that will be proposed in the document.

- 7 Should the ponds be required to meet Segment 5 Stream Standards for inter-pond transfers? Since DOE, RFFO has agreed that the landfill pond (located in Segment 4) is required to meet Segment 4 Stream Standards before release to Pond A-3 (located in Segment 5), has a precedent already been set for inter-pond transfers? Are all inter-pond transfers to be treated the same as this one-time removal of the Landfill Pond water? If so, EG&G recommends that the DOE, RFFO position be consistent with the description in # 6
- 8 Would DOE, RFFO review the attached list of pond water management alternatives and screening criteria, and determine if the list is appropriate for the IM/IRA document
- 9 How should EG&G consider utilization of Great Western Reservoir? It is important to note that any alternative that is proposed, with its associated costs and political ramifications, may be selected by the EPA as lead agency
- 10 EG&G is proceeding with principally an in house preparation of a biological assessment using the information currently being generated in the Ecological Evaluations of the CERCLA Baseline Risk Assessments for OU5 and OU6 and the work of the Ecological Monitoring Program and the Resource Protection Program to draft the required Biological Assessment. EG&G recommends the continued coordination of efforts between the OUs and the IM/IRA because it could save over \$100 000 in subcontractor costs and maintain in-house expertise

Rocky Flats Pond Water Management Administrative
Controls IM/IRA

Rocky Flats Pond Water Management Administrative Controls IM/IRA		Criteria to Evaluate Potential Alternatives									
IM/IRA Pond Alternatives		Weight Factor	1 Achieve Segment 4 Standards for Offsite Discharges	2 Ensure Protection of Functional Ecologies	3 Maintain Safety and Security of Dam Structures	4 Maximize Pond Volume Capacity for Storm Water Collection	5 Maximize Pond Capacity for Spill Collection	6 Minimize Contaminant Migration	Total	Cost	
1.0	Continued Batch Discharge with Phased in Pond Capacity Increases										
2.0	Continued Batch Discharge with Phased in Onsite Water Consumption										
3.0	Continued Batch Discharge with Phased in Direct Discharge of WWTP										
4.0	Flow through Treated Discharge with Phased in Treatment Upgrades										
5.0	Flow through Untreated Discharge with Phased in Real time Monitoring										

Criteria ranking (1 to 5) low (1) high (5) relative to each alternative
Weight factor (1X to 5X) important (1X) extremely important (5X)